

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYOVAC, INC.,)	
)	
Plaintiff/Counter-Defendant.)	Civil Action No. 04-1278
)	
vs.)	Hon. Kent A. Jordan
)	
PECHINEY PLASTIC PACKAGING,)	
INC.,)	
)	
Defendant/Counter-Plaintiff.)	

NOTICE OF RULE 30(b)(6) DEPOSITION OF CRYOVAC, INC. (No. 1)

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, defendant/counter-plaintiff Pechiney Plastic Packaging, Inc. ("Pechiney") will take the deposition of plaintiff/counter-defendant Cryovac, Inc. ("Cryovac") upon oral examination of the witness(es) designated by Cryovac as the person(s) most competent to testify on its behalf concerning the categories listed on attached Schedule A. The deposition shall be recorded by videotape and stenographic means and shall take place at the offices of Nelson Mullins, Poinsett Plaza, Suite 900, 104 South Main Street, Greenville, South Carolina 29601 beginning at 9:00 a.m. on April 12, 2005, or at such other place and time as may be agreed to by the parties.

In accordance with Rule 30(b)(6), Pechiney requests that Cryovac prepare its designee(s) to testify "as to matters known or reasonably available to" Cryovac regarding the subjects listed on attached Schedule A. Pechiney also requests that Cryovac provide Pechiney with written notice of at least five (5) business days before the deposition of the name and employment position of each person designated to testify on Cryovac's behalf, identifying the matters set forth in Schedule A as to which each person will testify.

The deposition, before a Notary Public or other person authorized by law to administer oaths, will continue from day to day until completed with such adjournments as to time and place as may be necessary. You are invited to attend and to cross-examine the witness.

Respectfully submitted,

PECHINEY PLASTIC PACKAGING, INC.

Dated: March 11, 2005

By: 
One of its Attorneys

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SCHEDULE A

1. Each element of damages including, but not limited to, lost sales, price erosion, and lost profits that Cryovac has allegedly sustained, including the amount of damages claimed, how those alleged damages were calculated, and all documents relating to the damages claimed.

2. All actual and proposed licenses or agreements (the "Agreements"), if any, whether terminated or not, exclusive or non-exclusive, involving multilayer films, including: (a) the effective dates and terms, (b) the patents or subject matter covered by the Agreements, (c) the names and addresses of all parties to the Agreements, (d) the royalty rates and types of royalties provided and paid in each Agreement, (e) all documents relating to actual or proposed Agreements.

3. All products embodying the '419 patent manufactured and sold at any time by Cryovac including whether or not statutory notice has been placed on such products, the dates when such products were first marked, and all documents related to such marking.

4. Disclosures by Cryovac of the products the embody the subject matter of the '419 patent to other parties regardless of the fact that the party that received the disclosures never entered into a license with Cryovac and all documents that constitute, refer to, or concern the same.

5. The authenticity, contents, completeness, and accuracy of documents relating to matters set forth in paragraphs 1-4 above.

CERTIFICATE OF SERVICE

I, Brian P. O'Donnell, an attorney, hereby certify that I caused true and correct copies of
Notice of Rule 30(b)(6) Deposition of Cryovac, Inc. (No. 1) to be served on:

JohnW. Shaw, Esq.
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This 11th day of March, 2005 via e-mail and regular mail.



Brian P. O'Donnell